

LEE A. DRIZIN, ESQ.
Nevada Bar No. 4971
LEE A. DRIZIN, CHTD.
2460 Professional Court, Ste. 110
Las Vegas, NV 89128
(702) 798-4955 FAX (702) 798-5955
lee@leedrizin.com

[Proposed] Liaison Counsel

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT LOWINGER, on Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

vs.

MGM MIRAGE, J. TERRENCE LANNI,
JAMES J. MURREN, DANIEL J.
D'ARRIGO, and ROBERT H. BALDWIN,

Defendants.

CASE NO. 2:09-cv-1558-RCJ-LRL

CLASS ACTION

KHACHATUR HOVHANNISYAN,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

MGM MIRAGE, J. TERRENCE LANNI,
JAMES J. MURREN, DANIEL J.
D'ARRIGO, and ROBERT H. BALDWIN,

Defendants.

Case 2:09-cv-2011-LRH-RJJ

CLASS ACTION

**JAMES VIDRINE'S MOTION FOR CONSOLIDATION AND FOR APPOINTMENT OF
LEAD PLAINTIFF AND APPROVING HIS SELECTION OF PLAINTIFFS' CO-LEAD
COUNSEL AND PLAINTIFFS' LIAISON COUNSEL**

1 PLEASE TAKE NOTICE that class member, James Vidrine ("Movant"), by his
2 counsel, hereby moves this Court for an Order (attached hereto as Exhibit A): (i)
3 consolidating the above-captioned actions (the "Related Actions") pursuant to Fed. R. Civ.
4 P. 42(a); (ii) appointing him as Lead Plaintiff in this action pursuant to §21D(a)(3)(B) of the
5 Securities Exchange Act of 1934 and 15 U.S.C. §78u-4(a); (iii) approving his choice of The
6 Brualdi Law Firm, P.C. and Weiss & Lurie as Plaintiffs' Co-Lead Counsel, and Lee Drizin
7 as Plaintiffs' Liaison Counsel and (iv) granting such other and further relief as the Court
8 may deem just and proper.

9 This motion is made on the grounds that (1) the Related Actions involve common
10 questions of law and fact and consolidation would avoid unnecessary delay; and (2)
11 Movant is the "most adequate plaintiff" pursuant to the Exchange Act. See 15 U.S.C.
12 §78u-4(a)(3)(B). In addition, Movant meets the requirements of Fed. R. Civ. P. 23(a)
13 because his claims are typical of the class members' claims and because he will fairly and
14 adequately represent the class. Further, Movant has selected and retained counsel with
15 substantial experience in prosecuting securities fraud class actions to serve as Counsel.

16 In support of this Motion, Movant submits herewith a Memorandum of Law in
17 Support and Declaration of Lee Drizin.

18
19 Dated: October 19, 2009

LEE A. DRIZIN, CHTD.

20
21 By /s/ Lee A. Drizin

Lee A. Drizin

Nevada Bar No. 4971

LEE A. DRIZIN, CHTD.

2460 Professional Court, Suite 110

Las Vegas, NV 89128

Telephone: (702) 798-4955

Facsimile: (702) 798-5955

lee@leedrizin.com

25
26 [Proposed] Liaison Counsel for Plaintiffs
27
28

1 **OF COUNSEL**

2 **THE BRUALDI LAW FIRM, P.C.**

3 Richard B. Brualdi

4 Sue Lee

5 29 Broadway, 24th Floor

6 New York, NY 10006

7 Tel: (212) 952-0602

8 Fax: (212) 952-0608

9 Attorneys for Class Member James Vidrine

10 **WEISS & LURIE**

11 Jordan L. Lurie

12 Leigh A. Parker

13 10940 Wilshire Boulevard, 23rd Floor

14 Los Angeles, CA 90024

15 Tel: (310) 208-2800

16 Fax: (310) 209-2348

17 [Proposed] Co-Lead Counsel for Plaintiffs

18
19
20
21
22
23
24
25
26
27
28